

1 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
 2 STIPULATE, AND REQUEST THIS COURT TO SET a case management conference for
 3 **February 6, 2013 at 2:00 p.m.**

4 This is a complex wrongful death /civil rights case that arose in the Alameda County Jail,
 5 with five Plaintiffs, and initially 12 named Defendants, and 20 Doe Defendants. The parties
 6 exchanged initial disclosures, exchanged written discovery, and subpoenaed records. Defendants
 7 took six depositions. Plaintiffs also took six depositions.

9 Plaintiffs subsequently moved the Court to grant leave to file a Second Amended Complaint
 10 in this matter, which included the substitution of Megan Hast, A.S.W., Corizon Health, Inc., Harold
 11 Orr, M.D., and Zelda Sancho, L.V.N. in place of previously named Doe Defendants. The Court
 12 granted Plaintiffs' Motion and ordered the parties to meet and confer to agree on a case
 13 management schedule.
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15 The parties have met and conferred but have not been able to reach agreement regarding a
 16 case management schedule. As such, the parties request that the Court set a case management
 17 conference to discuss the case management schedule, including the scope of discovery after the
 18 addition of the new defendants and in light of discovery already completed in this matter to date.
 19 All parties that have appeared in this matter¹ stipulate and agree to February 6, 2013 at 2:00 p.m. as
 20 the date and time for a case management conference.
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¹ Counsel for Defendants Harold Orr, Jr., M.D. and Corizon Health, Inc. has advised that at this time, they do not represent Defendant Zelda Sancho, L.V.N., who has not yet appeared in this action.

Therefore, the parties respectfully request that this Court set a case management conference in this matter for February 6, 2013 at 2:00 p.m.

Dated: January 23, 2013

HADDAD & SHERWIN

/s/ Michael J. Haddad

MICHAEL J. HADDAD

Attorneys for Plaintiffs

JOSEPH HARRISON, KRYSTLE HARRISON,
MARTIN HARRISON JR., and TIFFANY
HARRISON

Dated: January 23, 2013

THE LAW OFFICES OF JOHN L. BURRIS

/s/ Benjamin Nisenbaum*

BENJAMIN NISENBAUM

Attorneys for Plaintiff

M.H.

Dated: January 23, 2013

ANDRADA & ASSOCIATES

/s/ J. Randall Andrada*

J. RANDALL ANDRADA

Attorneys for Defendants

COUNTY OF ALAMEDA, GREGORY G. AHERN,
MATTHEW ALHF, ALEJANDRO VALVERDE,
JOSHUA SWETNAM, ROBERTO MARTINEZ,
ZACHARY LITVINCHUK, RYAN MADIGAN,
MICHAEL BARENO, FERNANDO ROJAS-
CASTANEDA, SHAWN SOBRERO, SOLOMON
UNUBUN, and MEGAN HAST, A.S.W.

1 Dated: January 23, 2013

LAW OFFICES OF NANCY E HUDGINS

2 /s/ Matthew M. Grigg*

3 NANCY E. HUDGINS

4 MATTHEW M. GRIGG

5 Attorneys for Defendants

6 HAROLD ORR, JR., M.D. and CORIZON HEALTH,
INC.

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8 * Mr. Nisenbaum, Mr. Andrada and Mr. Grigg provided their consent that this document be
9 electronically filed.

ORDER

Pursuant to stipulation of the parties and good cause appearing therefore, IT IS SO
ORDERED **except that the case management conference will be held on March 7, 2013, at 2:00
p.m.**

Dated: 1/24/2013


HONORABLE CLAUDIA WILKEN
United States District Judge